

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE: )  
 ) CASE NO. 18 B 07095  
Angela Robinson . ) HON. A. Benjamin Goldgar  
DEBTOR. ) CHAPTER 13

**NOTICE OF MOTION**

TO: Marilyn O Marshall, 224 South Michigan Ste 800, Chicago, IL 60604;

See Attached Service List

PLEASE TAKE NOTICE that on July 9, 2019, at 9:30 A.M., in courtroom 642 of the United States Bankruptcy Court, Everett McKinley Dirksen Building, 219 S. Dearborn Street, Chicago, Illinois 60604, I shall appear before the HONORABLE A. Benjamin Goldgar or before any judge sitting in his place and stead, and shall then and there present the attached MOTION TO MODIFY PLAN at which place and time you may appear if you see fit.

**PROOF OF SERVICE**

The undersigned, an attorney, certifies that he transmitted a copy of this notice and the attached motion to the attached service list via regular U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603 on June 18, 2019.

/s/ Jeremy M. Nevel

Attorney for Debtor

The Semrad Law Firm, LLC  
20 S. Clark Street, 28<sup>th</sup> Floor  
Chicago, IL 60603  
312-913-0625

Label Matrix for local noticing  
0752-1  
Case 18-07095  
Northern District of Illinois  
Eastern Division  
Tue Jun 18 15:58:35 CDT 2019

PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541-1021

U.S. Bankruptcy Court  
Eastern Division  
219 S Dearborn  
7th Floor  
Chicago, IL 60604-1702

ALIGNCUMULUS  
325 W Huron St #300  
Chicago, IL 60654-9132

Advocate Medical Group  
29368 Network Place  
Chicago, IL 60673-1293

Advocate Medical Group  
PO Box 92523  
Chicago, IL 60675-2523

Ally Financial  
200 Renaissance CTR  
Detroit, MI 48243-1300

Ally Financial  
PO Box 130424  
Roseville MN 55113-0004

AmeriCash Loans, L.L.C.  
P.O. Box 184  
Des Plaines, IL 60016-0003

Americash - Bankruptcy  
880 Lee Street  
Suite 302  
Des Plaines, IL 60016-6487

Americash - Bankruptcy  
Mkt Square Shop Ctr  
180 S Bolingbrook Dr  
Bolingbrook, IL 60440-2852

Arrowhead Advance  
Po Box 6048  
C/O Wakpamni Lake Community Corporation  
Pine Ridge, SD 57770-6048

Bayshore Properties  
c/o: Kahn Sanford LLP  
180 N Lasalle #2025  
Chicago, IL 60601-2611

Big Picture Loans  
E23970 Pow Wow Tribal  
Watersmeet, MI 49969

Brandon S. Lefkowitz  
24100 Southfield Road, Suite 203  
United States  
Southfield, MI 48075-2851

CAPITAL ONE  
P O Box 30253  
Salt Lake City, UT 84130-0253

COMENITY BANK/ASHSTWRT  
PO BOX 182789  
COLUMBUS, OH 43218-2789

Capital One  
11013 W Broad St  
Glen Allen, Virginia 23060-6017

Check Into Cash/dba/Check Into Cash of India  
Attn:Collections  
PO Box 550  
Cleveland, TN 37364-0550

Check into Cash  
1637 S. Cicero  
Cicero, IL 60804-1520

Citizens Bank N.A.  
1 Citizens Drive Mailstop ROP15B  
Riverside, RI 02915-3026

Citizens Bank NA  
480 JEFFERSON BLVD  
WARWICK, RI 02886-1359

City Of Chicago Department of Finance  
C/O Arnold Scott Harris P.C.  
111 W Jackson Blvd Suite 600  
Chicago, IL 60604-3517

City of Chicago - Parking and red Light Tick  
121 N. LaSalle Street  
Chicago, IL 60602-1202

Dish Network  
9601 S Meridian Blvd  
Englewood, Colorado 80112-5905

Dish Network  
PO Box 530714  
Atlanta, GA 30353-0714

FED LOAN SERV  
P.O. Box 60610  
Cornwall, PA 17016

FIRST PREMIER BANK  
c/o Jefferson Capital Systems LLC PO Box  
c/o Linda Dold  
Saint Cloud, MN 56302

First Premier Bank  
Jefferson Capital Systems LLC  
c/o Kelly Lukason  
PO Box 7999  
Saint Cloud, MN 56302-7999

Green Valley Cash  
P.O Box 615  
Hays, MT 59527-0615

HARRIS & HARRIS LTD  
222 Merchandise Mart Plaza, Suite 1900  
Chicago, IL 60654-1421

Harley Davidson Credit  
PO Box 15129  
Palatine, IL 60055-0001

Harley-Davidson Credit Corp.  
PO Box 9013  
Addison, Texas 75001-9013

Harris & Harris Ltd  
111 W Jackson Blvde S-400  
Chicago, IL 60604-4135

IDES - Bankruptcy Department  
PO Box 4385  
Chicago, IL 60680-4385

Illinois Department of Employment Security  
Bankruptcy Unit Collection Subdivision  
33 South State Street 10th Floor  
Chicago IL 60603-2808

Illinois Student Assistance Commission  
1755 Lake Cook Rd  
Deerfield, IL 60015-5209

Johnson, Justin  
231 Dogwood St  
Park Forest, IL 60466-1862

LENDING CLUB CORP  
71 STEVENSON ST STE 300  
SAN FRANCISCO, CA 94105-2985

LendingClub Corporation  
71 Stevenson Street, Suite 1000  
San Francisco, CA 94105-2967

MERRICK BANK  
Resurgent Capital Services  
PO Box 10368  
Greenville, SC 29603-0368

MERRICK BANK CORP  
One Paces West  
Suite 1400  
Atlanta, GA 30327-2734

Merrick Bank Corp  
PO Box 9201  
Old Bethpage, NY 11804-9001

Midland Funding, LLC  
Midland Credit Management, Inc. as  
agent for Midland Funding, LLC  
PO Box 2011  
Warren, MI 48090-2011

Money Lion LLC  
501 5th Ave  
New York, NY 10017-6107

Murphy, Bertam  
7602 Columbia Avenue  
Hammond, IN 46324-3025

NELNET LOANS  
6420 SOUTHPPOINT PKWY  
JACKSONVILLE, FL 32216-0946

Premier Bankcard, Llc  
Jefferson Capital Systems LLC Assignee  
Po Box 7999  
Saint Cloud Mn 56302-7999

Quantum3 Group LLC as agent for  
Comenity Bank  
PO Box 788  
Kirkland, WA 98083-0788

SYNCB/WALMAR  
PO BOX 965024  
EL PASO, TX 79998

Stroger Hospital of Cook County  
1900 W Polk Street  
Chicago, IL 60612-3723

Synchrony Bank  
c/o PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541-1021

US DEP ED  
PO Box 8937  
Madison, WI 53708-8937

US Dep Ed  
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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Harley-Davidson Credit Corp.	End of Label Matrix	
	Mailable recipients	61
	Bypassed recipients	1
	Total	62

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE:	)	
	)	CASE NO. 18 B 07095
Angela Robinson,	)	HON. A. Benjamin Goldgar
DEBTOR.	)	CHAPTER 13

**MOTION TO MODIFY PLAN**

NOW COMES the Debtor, Angela Robinson, by and through Debtor's attorneys, The Semrad Law Firm, LLC, moves this Honorable Court to enter an Order Modifying Debtor's Chapter 13 Plan of Reorganization as set forth below, and in support thereof states as follows:

1. That this Court has jurisdiction over this proceeding pursuant to 28 U.S.C §§1334 & 157. This is a core proceeding pursuant to 28 U.S.C. §157.
2. Debtor filed the above captioned voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code on March 12, 2018.
3. This Honorable Court confirmed the instant case on May 8, 2018.
4. That the Chapter 13 Plan requires the Debtor to make plan payments to the Chapter 13 Trustee in the amount of \$650.00 on a monthly basis for a term of 36 months.
5. That the Debtor's Chapter 13 Plan allows for secured creditors to be paid 100% of their allowed claims, and general unsecured creditors to be paid 10% of their allowed claims.
6. That Debtor received a \$2,272.00 refund upon filing the 2018 Federal Tax Return.
7. That the Debtor is entitled to retain \$1,200.00 of the \$2,272.00 tax refund pursuant to Section 2.3 of the confirmed Plan with the remaining \$1,072.00 of the tax refund owed to the Chapter 13 Trustee.
8. That Debtor spent \$1,072.00 of her 2018 tax refund on moving expenses and a

security deposit. Please see Exhibit A.

9. Debtor respectfully requests that this Honorable Court waive \$1,072.00 of the 2018 tax refund owed to the Chapter 13 Trustee.
10. Debtor is in a position to continue with the plan of reorganization.
11. That the Debtor has every good faith intention of completing the Chapter 13 Plan of reorganization.

WHEREFORE, the Debtor respectfully requests that this Honorable Court enter an Order Modifying the Debtor's Chapter 13 Plan as follows:

- A. That \$1,072.00 of the Debtor's 2018 Federal Tax Refund is waived; and
- B. For such other and further relief as this Court deems fair and just.

Respectfully Submitted,

/s/ Jeremy M. Nevel  
Attorney for the Debtor

The Semrad Law Firm, LLC  
20 S. Clark Street, 28<sup>th</sup> Floor  
Chicago, IL 60603  
(312) 913-0625